





United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

February 6, 2020

BY ECF

Honorable Paul A. Engelmayer United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: The New York Times Company v. U.S. Department of State et al., 19 Civ. 9420 (PAE)

Dear Judge Engelmayer:

This Office represents the Department of State (the "State Department") and the Department of Justice (the "DOJ" and, together with the State Department, the "Defendants"), in the above-captioned action.

Defendants write to request an extension of one business day of the deadline to submit a joint pre-conference status letter, from Friday, February 7, 2020, 1 to Monday, February 10, 2020. The initial pretrial conference in this matter is scheduled for Wednesday, February 12, 2020 at 3:30 p.m. The parties have been engaged in productive discussions about a proposed schedule for the Defendants to process potentially responsive records in this Freedom of Information Act lawsuit. Defendants are still gathering relevant information, and believe that the requested extension will allow for further progress toward reaching agreement on a proposed schedule.

This is Defendants' first request for an extension of this deadline. Plaintiff New York Times Company consents to this request.

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¹ See Notice of Initial Pretrial Conference (Dkt. No. 18).

We thank the Court for its consideration of this request.

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney for the Southern District of New York

By: /s/ Andrew E. Krause

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cc: All counsel of record via ECF

2/7/2020

Granted.

SO ORDERED.

United States District Judge